

# Exhibit 8

(To the October 26, 2021 Declaration of  
Margaret A. Dale)

**Dalsen, William D.**

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**From:** Jennings, Taleah <Taleah.Jennings@srz.com>  
**Sent:** Sunday, October 10, 2021 8:09 PM  
**To:** Alonzo, Julia D.  
**Cc:** Dale, Margaret A.; Mervis, Michael T.; Stafford, Laura; Arturo J. Garcia-Sota; Nayuan Zouairabani; Lizzie M. Portela Fernández ; Douglas Koff; Mott, Thomas L.; Douglas S. Mintz  
**Subject:** Re: FOMB 30(b)(6)

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Julia: The language you propose is very broad - can we limit the FOMB objections to what we discussed. Proposed language pasted below. Also, given the number of depositions now scheduled through the 18th, we will need to push this deposition to either the 20th or 22nd. Please let us know which of those two dates work best. Thanks.

TO: The deposition of the EY Representative will be defended by counsel from Ernst & Young. Notwithstanding the foregoing, counsel for the Oversight Board may object to the DRA Parties' questions in order to protect the Oversight Board's interests regarding privilege issues, matters relating to PROMESA section 106(e), and, only if not made by counsel for Ernst & Young, objections to form.

On Oct 10, 2021, at 3:35 PM, Alonzo, Julia D. <jalonzo@proskauer.com> wrote:

Taleah –

Following up on this. We would like to get this finalized today, if possible. Thank you.

Julia

**Julia D. Alonzo**

Senior Counsel  
(she/her/hers)

[Proskauer](#)

Eleven Times Square  
New York, NY 10036-8299  
d 212.969.4558  
f 212.969.2900  
[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)

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**From:** Jennings, Taleah <Taleah.Jennings@srz.com>  
**Sent:** Saturday, October 9, 2021 9:23 AM  
**To:** Alonzo, Julia D. <jalonzo@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Mervis,

Michael T. <MMervis@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>

Cc: Arturo J. Garcia-Sota <ajg@mcvpr.com>; Nayuan Zouairabani <nzt@mcvpr.com>; Lizzie M. Portela Fernández <Lpf@mcvpr.com>; Douglas Koff <douglas.koff@srz.com>; Mott, Thomas L. <Thomas.Mott@srz.com>; Douglas S. Mintz <douglas.mintz@srz.com>

**Subject:** RE: FOMB 30(b)(6)

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Julia, thanks for the response. We will discuss on our end and get back to you.

**Taleah E. Jennings**

Partner

212.756.2454

my pronouns: she/her/hers

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Schulte Roth & Zabel LLP  
[www.srz.com](http://www.srz.com)

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**From:** Alonzo, Julia D. <[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)>

**Sent:** Saturday, October 9, 2021 9:20 AM

**To:** Jennings, Taleah <[Taleah.Jennings@srz.com](mailto:Taleah.Jennings@srz.com)>; Dale, Margaret A. <[mdale@proskauer.com](mailto:mdale@proskauer.com)>; Mervis, Michael T. <MMervis@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>

**Cc:** Arturo J. Garcia-Sota <[ajg@mcvpr.com](mailto:ajg@mcvpr.com)>; Nayuan Zouairabani <[nzt@mcvpr.com](mailto:nzt@mcvpr.com)>; Lizzie M. Portela Fernández <[Lpf@mcvpr.com](mailto:Lpf@mcvpr.com)>; Koff, Douglas <[Douglas.Koff@srz.com](mailto:Douglas.Koff@srz.com)>; Mott, Thomas L. <[Thomas.Mott@srz.com](mailto:Thomas.Mott@srz.com)>; Mintz, Doug <[Douglas.Mintz@srz.com](mailto:Douglas.Mintz@srz.com)>

**Subject:** RE: FOMB 30(b)(6)

Taleah –

We have discussed internally and with EY's in-house counsel, and EY will be defending the deposition of the EY Representative. As you and I discussed yesterday, we suggest modifying Paragraph 6 as follows:

CHANGE: Only one attorney shall defend the deposition of the EY Representative, and only that attorney may object to the DRA Parties' questions, absent privilege issues that require additional attorneys' involvement.

TO: The deposition of the EY Representative will be defended by counsel from Ernst & Young. Notwithstanding the foregoing, counsel for the Oversight Board may object to the DRA Parties' questions in order to protect the Oversight Board's interests, including privilege issues, matters relating to PROMESA section 106(e), and, if not made by counsel for Ernst & Young, objections to form.

Please let us know if this works for the DRA Parties.

As far as scheduling this deposition, we propose 10/18. The EY representative could do 10/15 if absolutely necessary, but has a strong preference due to other commitments for 10/18. Please advise.

Thanks,

Julia

**Julia D. Alonzo**

Senior Counsel  
(she/her/hers)

[Proskauer](#)

Eleven Times Square  
New York, NY 10036-8299  
d 212.969.4558  
f 212.969.2900  
[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)

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**From:** Jennings, Taleah <[Taleah.Jennings@srz.com](mailto:Taleah.Jennings@srz.com)>

**Sent:** Friday, October 8, 2021 5:23 PM

**To:** Alonzo, Julia D. <[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)>; Dale, Margaret A. <[mdale@proskauer.com](mailto:mdale@proskauer.com)>; Mervis, Michael T. <[MMervis@proskauer.com](mailto:MMervis@proskauer.com)>; Stafford, Laura <[lstafford@proskauer.com](mailto:lstafford@proskauer.com)>

**Cc:** Arturo J. Garcia-Sota <[ajg@mcvpr.com](mailto:ajg@mcvpr.com)>; Nayuan Zouairabani <[nzt@mcvpr.com](mailto:nzt@mcvpr.com)>; Lizzie M. Portela Fernández <[Lpf@mcvpr.com](mailto:Lpf@mcvpr.com)>; Douglas Koff <[douglas.koff@srz.com](mailto:douglas.koff@srz.com)>; Mott, Thomas L. <[Thomas.Mott@srz.com](mailto:Thomas.Mott@srz.com)>; Douglas S. Mintz <[douglas.mintz@srz.com](mailto:douglas.mintz@srz.com)>

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We are okay with your changes, with one exception. Paragraph 6:

CHANGE: One attorney appearing on behalf of Ernst & Young and one attorney appearing on behalf of the Oversight Board shall defend the deposition of the EY Representative, and those attorneys may object to the DRA Parties' questions, absent privilege issues that require additional attorneys' involvement.

TO: Only one attorney shall defend the deposition of the EY Representative, and only that attorney may object to the DRA Parties' questions, absent privilege issues that require additional attorneys' involvement.

Please let us know if we need to discuss, or if we can make this change and put this issue to rest.

Thank you,  
Taleah.

**Taleah E. Jennings**

Partner  
212.756.2454  
my pronouns: she/her/hers

---

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[www.srz.com](http://www.srz.com)

---

**From:** Alonzo, Julia D. <[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)>

**Sent:** Friday, October 8, 2021 4:58 PM

**To:** Jennings, Taleah <[Taleah.Jennings@srz.com](mailto:Taleah.Jennings@srz.com)>; Dale, Margaret A. <[mdale@proskauer.com](mailto:mdale@proskauer.com)>; Mervis, Michael T. <[MMervis@proskauer.com](mailto:MMervis@proskauer.com)>; Stafford, Laura <[lstafford@proskauer.com](mailto:lstafford@proskauer.com)>

**Cc:** Arturo J. Garcia-Sota <[ajg@mcvpr.com](mailto:ajg@mcvpr.com)>; Nayuan Zouairabani <[nzt@mcvpr.com](mailto:nzt@mcvpr.com)>; Lizzie M. Portela

Fernández <[Lpf@mcvpr.com](mailto:Lpf@mcvpr.com)>; Koff, Douglas <[Douglas.Koff@srz.com](mailto:Douglas.Koff@srz.com)>; Mott, Thomas L.

<[Thomas.Mott@srz.com](mailto:Thomas.Mott@srz.com)>; Mintz, Doug <[Douglas.Mintz@srz.com](mailto:Douglas.Mintz@srz.com)>

**Subject:** RE: FOMB 30(b)(6)

**-CAUTION: EXTERNAL EMAIL from [jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)**

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Taleah –

Attached please find our edits to the stipulation. EY is not going to sign onto the stipulation but they have represented that they will accept the subpoena and provide the witness. And the Oversight Board will adopt the witness's for purposes of the Rule. We revised the stipulation accordingly.

Let me know if you would like to discuss. Thanks.

Julia

**Julia D. Alonzo**

Senior Counsel  
(she/her/hers)

[Proskauer](#)

Eleven Times Square  
New York, NY 10036-8299  
d 212.969.4558  
f 212.969.2900  
[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)

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**From:** Jennings, Taleah <[Taleah.Jennings@srz.com](mailto:Taleah.Jennings@srz.com)>

**Sent:** Friday, October 8, 2021 8:47 AM

**To:** Dale, Margaret A. <[mdale@proskauer.com](mailto:mdale@proskauer.com)>; Mervis, Michael T. <[MMervis@proskauer.com](mailto:MMervis@proskauer.com)>;

Alonzo, Julia D. <[jalonzo@proskauer.com](mailto:jalonzo@proskauer.com)>; Stafford, Laura <[lstafford@proskauer.com](mailto:lstafford@proskauer.com)>

**Cc:** Arturo J. Garcia-Sota <[ajg@mcvpr.com](mailto:ajg@mcvpr.com)>; Nayuan Zouairabani <[nzt@mcvpr.com](mailto:nzt@mcvpr.com)>; Lizzie M. Portela Fernández <[Lpf@mcvpr.com](mailto:Lpf@mcvpr.com)>; Douglas Koff <[douglas.koff@srz.com](mailto:douglas.koff@srz.com)>; Mott, Thomas L.

<[Thomas.Mott@srz.com](mailto:Thomas.Mott@srz.com)>; Douglas S. Mintz <[douglas.mintz@srz.com](mailto:douglas.mintz@srz.com)>

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Margaret:

Attached is a stipulation setting forth the terms we discussed. We would like to get this finalized and signed today, so we can then issue the subpoena to EY.

Thanks for your help getting this done.

Taleah.

**Taleah E. Jennings**

Partner

212.756.2454

[taleah.jennings@srz.com](mailto:taleah.jennings@srz.com)

my pronouns: she/her/hers

919 Third Avenue, New York, NY 10022

212.756.2000 | 212.593.5955 fax

Schulte Roth & Zabel LLP  
New York | Washington DC | London  
[www.srz.com](http://www.srz.com)

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